

**Prevention of Significant Air Quality Deterioration Review
Of the Temple – Inland Rome Lumber Mill
Rome, Georgia (Floyd County)**

**FINAL DETERMINATION
Permit Application No. 16496
May 2006**



**State of Georgia
Department of Natural Resources
Environmental Protection Division
Air Protection Branch**

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BACKGROUND

On November 22, 2006, Temple - Inland submitted an application for an air quality permit amendment for its Rome Lumber Mill located at 380 Mays Bridge Road, in Rome (Floyd County), Georgia, to remove the PSD avoidance production restrictions on the three dry kilns (Emission Units ID No. LKD1, LDK2, and LDK3). The kilns had been limited to a total of 151.25 million board feet per any twelve consecutive months. The allowable capacity of the plant will now be 180 million board feet per any twelve consecutive months

On April 1, 2006, the Division issued a Preliminary Determination indicating that the Air Quality Permit for the Rome Lumber Mill should be amended to remove the production limitations on the kilns, and to allow an increase in the total lumber production capacity of the mill up to 180.0 million board feet per year in the three lumber drying kilns. The Preliminary Determination contained a draft Air Quality Permit Amendment for authorizing the facility to make the above changes.

The Division requested that Temple - Inland place a public notice in a newspaper of general circulation in the area of the existing facility, notifying the public of the proposed modifications and providing the opportunity for written public comment. Such public notice was placed in *The Rome News-Tribune* (legal organ for Floyd County) on April 1, 2006. The public comment period expired on May 2, 2006.

During the 30-day public comment period, written comments were received from the facility. No comments were received from the public. No comments were received from the U.S. EPA, which sent an email dated April 27, 2006 indicating that "We have no adverse comments on this permit." Changes have been made to the final Permit, based upon facility's comments. Included with this Final Determination in Appendix A is a copy of the final Air Quality Permit Amendment No. 2421-115-0016-V-01-3 being issued by the Division to the Temple - Inland Rome Lumber Mill to change the production restriction on kilns.

A copy of the full written comments received during the public comment period is provided in Appendix B.

1.0 Review of Comments Submitted by Temple – Inland

The public comment period ended on May 2, 2006. Written comments were received on the draft permit from the Rome Lumber Mill, by letter dated April 21, 2006. The comments are reproduced verbatim below, followed by a discussion of the comments and any changes made to the permit as a result. [Note that comments marked with asterisks (*) resulted in changes to the permit.] Follow-up comments were submitted by Temple – Inland, upon requests by EPD for clarification. These are quoted in part below and attached in full.

Comment 1: In regard to comments by USEPA concerning the inclusion of a production limit under Condition 3.2.2 we offer the following comments:

We agree with including a limit in lbs of VOC/MBF, however we should alter the calculation from TB No.845 so that it applies to steam fired kilns such as those at the Rome Sawmill. The application we submitted proposed 3.5 lbs VOC as C/MBF, plus methanol, formaldehyde and a safety factor for conservatism that equaled to 4.0 lbs VOC/MBF.

Division Response: *The Division believes the data submitted by Temple-Inland to be reasonable. However, because EPA did not actually submit any comments regarding this permit, a VOC BACT emission rate will not be included.*

***Comment 2:** Part 5.2.5 - end of last sentence reads, "shall be kept in a maintenance log". Request to change this wording to read "shall be kept in a maintenance log or CMMS" (acronym for Computerized Maintenance Management System)

Division Response: *The Division requested clarification of what was to be done if problems were found. According to an email sent on May 2, 2006, the facility will use a manual checklist or log for the required checks. The checklist will be dated, with the name of inspector indicated. "If something needs a quick repair, it is done on the spot and noted as repaired." On the other hand, "If the item (i.e., a damaged baffle) cannot be repaired on the spot, a work order will be generated and it will be repaired later. If it cannot be repaired w/i 24 hours it will be in the deviation report." A further email clarified: "If the item is not repaired on the spot/during the inspection, then the item is taken back and entered into the CMMS which generates a work order for the maintenance dept. to repair. Obviously, the goal is to repair within 24 hours (i.e., a damaged baffle) however if it is not repaired w/i 24 hours it will be recorded as an excursion and placed in a 6 month deviation report."*

It appears from the above, that if a repair cannot be made within 24 hours, a problem will be entered into the computer maintenance system and a work order generated to assure it is addressed in a timely manner.

In a follow-up email, Temple-Inland indicated that this a 24-hour turn-around time was quicker than was needed for the items that needed to be inspected only every 6 weeks or every 6 months. They agreed to a 7-day turn-around time. EPD agrees to the requested change.

***Comment 3:** Part 5.2.5, Item b. Daily Routine, ii - reads, "Check all baffles for damage, and report problems in writing to the Maintenance Department". Request to change this wording to read "Check all baffles for damage, and report problems". As noted above all of these work practices will be held in the facility CMMS.

Division Response: *For the same reasons mentioned above, the Division agrees to the change.*

Comment 4: Part 5.2.5, Item e. - This provision is a bit ambiguous and needs to be clarified. It is clear, i and ii are required to be reported on our Title V deviation reports. However, we need to clarify that all the other work practices that result in routine repairs and maintenance detailed in Part 5.2.5 a-d are not required to be reported as deviations, just checked and corrected and kept in the facility CMMS for future GAEPD inspections.

Division Response: *The Division agrees that this conditions is ambiguously written. Its purpose is to spell out what must be done and what records must be made when problems are discovered during the required inspections. While the proposed condition used the words "excursions" and "exceedances," it is not meant to imply that these were necessarily reportable excursions, since Condition 6.1.7 specifies what must be reported. However, the use of these words is confusing in this condition, so the Division agrees to change the condition to specify: (1) that problems are to be noted in a maintenance log, a checklist, or the facility's Computerized Maintenance Management System (CMMS); (2) that if item can be repaired within a specified time-frame (24 hours for daily items and 7 days for other items), it only need be recorded in the maintenance log; (3) but if it takes more time to repair, it must be entered into the CMMS, which, according to the Permittee, will generate a work order. The remedy must also be entered into the CMMS. Only those problems not fixed during the specified time-frame are to be considered excursions and, as specified in Condition 6.1.7, must be reported*

Note that the subparagraphs 5.2.5e.i and ii is removed. They will be added to Condition 6.1.7c, as reportable excursions. They were:

- i. Any time a wet bulb temperature set-point-drying scheduled more than 240oF.*
- ii. Any time a final moisture content drying operation targeted less than 12%.*

Addressing Comments 3, 4, and 5, Condition 5.2.5 will now read:

5.2.5 Within 90 days of the issuance of this permit, the Permittee shall develop and implement a Work Practice and Preventive Maintenance Program for the lumber drying kilns (LDK1, LDK2, and LDK03) to assure that the provisions of Condition 8.17.1 are met. The program shall be subject to review and modification by the Division. At a minimum, the following operational and maintenance checks shall be made:

[391-3-1-.02(6)(b)1, 40 CFR 52.21, and 40 CFR 70.6(a)(3)(i)]

- a. General Work Practice Standards for Wood Drying Kiln Operation:

- i. The lumber kiln drying operation target final moisture content will be 12% or greater.
 - ii. The lumber kiln shall be operated following a wet bulb temperature set point-drying schedule of 240°F or lower.
 - iii. Routines for periodic preventative maintenance are detailed in paragraphs b, c, d, e, and f of this condition, and are based on manufacturer's recommendations.
- b. Daily Routine:
- i. Inspect wet bulb socks and replace as needed. Replace a sock daily if it has a tendency to become hard. Check water flow to the wet bulb.
 - ii. Check all baffles for damage, and report problems.
 - iii. Make certain all fans are running. If one "trips out" frequently, investigate to determine the reason and then document the solution.
 - iv. Check to verify that the heating system is operating properly.
- c. Six Week Routine:
- i. Grease fan motors and bearings, inspect fans for damage. Check fan clearances and rotation. Tension and replace belts if required.
 - ii. Lubricate kiln trucks and inspect tracks for damage.
 - iii. Inspect kiln walls and doors for deterioration and schedule repairs as needed.
 - iv. Inspect temperature sensor mounts for damage. Ensure that all temperature monitors are pointed toward the lumber and in the air flow.
 - v. Inspect vents and linkages. Schedule repairs as needed.
 - vi. Grease vent shafts on vents in internal linkages.
 - vii. Sweep out kiln to remove accumulated dust.
- d. Semi-annual Routine:
- i. Verify accuracy of the temperature measurement systems. Repair or replace components as necessary.

- ii. Inspect steam supply main and headers for steam leaks and insulation deficiencies. Repair as needed. Inspect steam traps for proper operation and replace/repair as needed. Stroke all steam valves.
- e. Any adverse condition discovered during these inspections shall be corrected in the most expedient manner possible. The Permittee shall record problems discovered in a maintenance log/checklist or the plant's Computerized Maintenance Management System (CMMS), indicating the corrective action(s) taken. If a problem discovered during a daily inspection cannot be remedied within 24 hours of discovery, it shall be entered into the plant's Computerized Maintenance Management System (CMMS) as an excursion. If a problem discovered during other inspections cannot be remedied within 7 days of discovery, it shall be entered into the plant's Computerized Maintenance Management System (CMMS) as an excursion.

***Comment 5:** 6.1.7 c. iv. – reads, “Any adverse condition(s) discovered and corrective action taken during the procedure to follow the work practice and preventive maintenance plan required in Condition No. 5.2.5. We request deletion of this provision. Item 6.1.7 c. iii. adequately addresses the requirement to conduct work practices on a daily, six week and semi-annual basis. As noted above routine repair and maintenance of fans, motors, belts, sensors, baffles, doors, socks, etc. detected during these routine work practice inspections will be repaired and/or corrected and entered into the facility CMMS and available for inspection by GAEPD.

Division Response: *The Division agrees that this condition should not require the semiannual reporting of all problems discovered, only those that cannot be corrected within acceptable period of time. During further email exchanges with the facility, it was determined that 24 hours should be allowed for correcting problems discovered during “Daily Routine” inspections per Condition 5.2.5b, but that 7 days should be allowed for correcting problems discovered during inspections occurring as part of the “Six Week Routine” per Condition 5.2.5b and the “Semi-annual Routine” per Condition 5.2.5c . All problems that are corrected within one day are merely subject to the record keeping requirements of Title V, which requires that all records be kept for five years. Revised Condition No. 6.1.7c.iv. will read as follows:*

Any adverse condition discovered, that is not remedied within 24 hours, while following the Daily Routine, per Condition No. 5.2.5.b. While following the Six Week Routine or the Semi-annual Routine, per Condition Nos. 5.2.5b and 5.2.5c, any adverse condition discovered, that is not remedied within 7 days. Information on the corrective action(s) taken shall be included.

As indicated above, what had been paragraphs 5.2.5e.i and ii will now be included in 6.1.76c.v and vi., as follows:

- v. Any time a wet bulb temperature set-point-drying scheduled more than 240°F.

- vi. Any time a final moisture content drying operation targeted less than 12%.

Comment 6: 6.2.5 – states the need to notify the division when drying exceeds 15,000,000 board feet during any calendar month. We are required by this permit not to exceed 180,000,000 board feet and report on a semi-annual basis the previous six 12-consecutive month totals. In an effort to reduce paperwork for the Rome Sawmill management and GAEPD we request deletion of this provision.

Division Response: *The Division agreed to remove this condition, and replace it with a condition requiring that requires the company to “report monthly totals semi-annually.” In response to that, Temple-Inland stated that they would rather have a reporting limit of 15 million bdft, since “we should rarely exceed this limit in the next couple of years.” Therefore, no changes were made the permit in response to this comment.*

***Comment 7:** 6.2.8 – the first sentence states, “ The Permittee shall maintain a kiln operation and maintenance log book for the following records in a permanent form.” Request to change this wording to “The Permittee shall maintain a kiln operation maintenance log or CMMS for the following records in a permanent form.”

Division Response: *The Division agrees to make this change. The revised Condition No. 6.2.8 will read as follows:*

The Permittee shall maintain a kiln operation and maintenance log, or keep such information in their CMMS, for the following records. These records shall be retained for at least five years following the date of entry. The records shall be available for inspection or submittal to the Division upon request.

***Comment 8:** 6.2.8 a. - request deletion of the word “manually”. Records will be kept in an electronic format (i.e., CMMS).

Division Response: *The Division agrees to make this change since there is no need to specify whether the records are made manually or automatically. The revised Condition No. 6.2.8a will read as follows:*

- a. Reports shall be kept for each batch (or charge) processed and shall contain as a minimum the date, charge quantity, actual drying time, maximum wet bulb actual and set point temperature, dry bulb actual temperature and set point temperature over the lumber drying time range, and the final target moisture content.

***Comment 9:** 6.2.8 b. – request deletion of the word “logbook” and replace with “CMMS”

Division Response: *The Division agrees to make this change since it is completely acceptable to use an electronic record keeping device, as long as the information thus stored is accessible to Division inspectors. The revised Condition No. 6.2.8b will read as follows:*

- b. For each visual inspection, the logbook or CMMS shall contain the date, the initials of the personnel conducting the inspection, results of the visual inspection, documentation of any maintenance performed and any calibration performed on the kiln operation control equipment.

APPENDIX A: Final PSD Permit

Temple-Inland – Rome Lumber Mill (Floyd County), Georgia

Part 70 Operating Permit Amendment No. 2421-115-0016-V-01-3.

APPENDIX B: Comments**Temple-Inland – Rome Lumber Mill (Floyd County), Georgia**

A copy of the full written comments received during the public comment period is provided, as below:

1. Comments received from the Temple-Inland – Rome Lumber Mill by letter dated April 21, 2006.
2. Comments received from the Temple-Inland – Rome Lumber Mill in e-mails exchange with the Division, in order to clarify the comments dated April 21, 2006.
3. Email from USEPA dated April 27, 2006, indicating that they had “no adverse comments on this permit.”